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National Recreation Residence Review and Action Plan



September 1993



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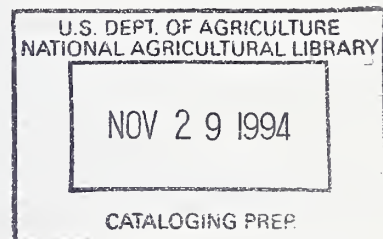
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National Recreation Residence Review and Action Plan

September 1993



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Executive Summary In May 1990, then Associate Deputy Chief Larry Henson decided the Forest Service should conduct an internal review of recreation residence (RR) permit administration on the southern California national forests. Based on the preliminary findings from these 4 national forests, Henson enlarged the study to include national forests throughout the nation.

A 3-person steering committee developed the methods and procedures for the review. The Washington Office Lands staff, led by Director of Lands, Gordon H. Small, did the study with help from the sample units.

The review involved interviews with administrators and staffs, field checks and permit inspections, and a final report complete with findings, recommendations and action plan. Forty ranger districts in 21 national forests and 8 regions participated. Four-person Forest Service teams questioned national forest and ranger district line officers and staffs about their RR programs and concerns, and field-checked RR lot conditions. These teams visited over 5,500 lots, or slightly over one-third of the 15,570 permitted lots in the National Forest System. They checked all lots for signs of recent construction work and approvals, and over 600 lots for permit compliance.

The major results of the study, with recommendations prepared by the Chief's Office, were presented to the Regional Foresters for review in a draft Executive Summary in November 1991. The final product of that effort follows:

I. Areas of Concern and Associated Findings:

A. No Action on Permit Problems

Suspected Full-time Occupancy. Southern California national forests have a major problem with suspected full-time occupancy.

Unauthorized Improvements. Over 50 percent of the lots have at least one improvement that has not been approved properly.

Nonpayment of Fees. Some units tolerate non-payment of fees rather than take termination action and risk possible reversal.

Non-compliance. Over 50 percent of the lots have permit compliance problems.

Unauthorized Construction. Unauthorized construction has occurred at 50 percent of the lots in the last 7 years.

Unauthorized Off-lot Improvements. Many units allow permittees to own/use individual and tract facilities without proper authorization.

Unauthorized Rentals. Most units consider cabin renting an unnecessary activity to approve and monitor.

Appearance. Over 40 percent of the lots are of substandard appearance as determined by visual checks of physical conditions.

B. Inconsistent Policy, Procedures, and Practices

Transfer Requirements. Permit transfers are taking much longer to complete than expected.

Development Levels. Cabins are growing in size and convenience with or without Forest Service development limits.

Approval for Changes. Permittee proposals are being approved by persons without authority to do so.

Interpretation of Permit Terms and Conditions. Permit compliance requirements are inconsistent among units.

Enforcement. Permit enforcement is minimal and declining.

Unique Structures. Unique structure policies are typically local and informal.

Maps and Signs. Tracts and lots lack accurate maps, signing, and posted lot boundary corners.

C. Permit Administration

Interpretation of Policies and Procedures. Requirements vary by unit according to formal direction and personal knowledge and commitment.

Emphasis. Unit interest is minimal and waning due to lack of management attention.

Compliance. Permittee performance stems more from personal desire than Agency direction or urging.

D. Management

Records. Permit folders often lack essential information such as maps, approval documents, and final construction plans.

Lot Inspections. Required inspections are typically untimely.

Management Reviews. Management is not effectively monitoring permit administration, thus the program is at high-risk for waste, fraud, and misuse.

FSM/FSH and Other Written Direction. Formal direction on RR permit administration is absent or sparse and outdated on most units.

Funding/Staffing. RR funding is low, declining, and typically not budgeted or tracked.

Training. Practical experience rather than formal training is the primary source of permit administrator training.

Increasing Workload. Requests for new cabins, building additions, and reconstruction items are increasing because most permittees now have new 20-year term permits.

Opportunities for Improved Conditions. Units are missing opportunities for improved permittee relations and management efficiencies by not making themselves more visible and available to RR permittees.

II. Actions:

The intensive review of the Forest Service's RR Program in 1990-91 documented major problems in the administration of special use permits. At the top of the list of problems were unauthorized improvements and inconsistent policies and guidelines. Reviews of other special uses have shown similar problems. The Forest Service has a land stewardship responsibility to ensure that all land uses are authorized and managed to protect environmental values and public health and safety, with fairness and equity to the permittees and

public. The following actions were approved and are the first steps in improving management of land use authorizations. These items are explained more detail in Chapter 3 -- Action Plan of this report.

1. Recognize special use permit administration needs in budget advice, preparation, and allocation.

Responsibility: Chief and Regional Foresters

Discussion: The experience of everyone who administers special use permits, clearly supports this action item. The Washington Office (WO) will encourage and support realistic budget requests to administer special use permits. Field units need to develop more reliable estimates of the actual cost of administering special use permits. Additional information and examples will need to be developed to support increased requests through the Department of Agriculture, the Office of Management and Budget (OMB), and Congress. However, honesty in budgeting and changes in agency funding require serious attention to longstanding stewardship issues.

2. Develop and update regional special uses administration handbooks to achieve consistency of administration.

Responsibility: Chief and Regional Foresters

Discussion: Most Forests administer RR permits without benefit of clear, consistent, and up-to-date direction from their Regional Office. Furthermore, Forests and Districts find themselves making decisions of national or regional impacts without benefit of adequate training or experience. The lack of direction in such areas as permit compliance, enforcement, and lot development creates major inconsistencies between units at all Forest Service levels. Implementation of this action item requires adoption of the revised RR policy. This is expected by the end of CY 93. An ad hoc team of field and WO representatives will identify and address the issues of national importance found in the report and update the directives system. Regional representatives will then prepare and/or update Regional guides.

3. Establish and implement a national certification policy/program for special use administrators that includes standards for knowledge, skills, practical experience, and abilities (tools) to administer permits.

Responsibility: Chief and Regional Foresters

Discussion: While field units generally support the concept and recognize the benefits of certification in other program areas, they are concerned about specific certification requirements. An ad hoc team of field and WO representatives will be established to develop national policy, direction and guidelines for certification and implementation. WO-Lands and Recreation staffs will lead the implementation of this action item.

4. Recognize and reward good special use administration.

Responsibility: All units

Discussion: Although some field units believe that attention, rewards, and incentives would be redundant, experience has shown there is little recognition for good permit administration. In fact, most of the feedback on permit administration has tended to discourage productive efforts. The most notable exception is the Ranger of the Year award offered by the National Forest Recreation Association. The Forest Service needs to recognize and reward employees who do an exceptional job in carrying out these stewardship responsibilities, just as we do with many other activities. To that end, a national award will be established to be presented each year to the individual or group that best exemplifies good permit administration. Field units are also encouraged to find ways to provide incentives for good work in this area.

- 5. Give special funding, staff support, and technical assistance to southern California national forests, as needed, to bring permits into compliance.**

Responsibility: Chief and Regional Forester for the Pacific Southwest Region

Discussion: It is obvious from the RR review that several southern California Ranger Districts have serious permit compliance problems that will require regional and national help to correct. Hundreds of unauthorized structures and unauthorized full-time occupancies are but two types of problems they face. The Regional Forester should identify the issues and prepare an action plan for resolution and assistance.

- 6. Consider using zone organizations to administer special use permits.**

Responsibility: Regional Foresters

Discussion: Special use administration, along with title claims, landownership adjustments, treaty rights, and other lands activities require specific property rights perspectives, experience, and skills. Unfortunately, funds are lacking to provide these skills to every level in the agency. Zone organizations have been used to a limited extent for lands-related work, primarily in landownership adjustments. Zone offices could handle a much broader range of Lands work, including special use administration. This will encourage more consistent practices, promote development of improved skills, and improve public service. While this is counter to Agency tradition, it no longer seems possible to administer these responsibilities in a fully decentralized mode. Therefore, we must try other ways of meeting these stewardship responsibilities.

- 7. Establish or implement regional inspection and audit systems to monitor national forest special use permit administration.**

Responsibility: Regional Foresters

Discussion: Most regions have modified their internal review systems to better address the integrated environment of today's forest plans. In doing so, however, the risks of waste, fraud, and misuse inherent in special uses have been overlooked. The serious problems with permit administration are, in part, a result of lack of attention to the program. Accountability is needed in this fundamental responsibility.

Chapter 1 - Introduction

Purpose and Procedure

The Forest Service administers over 72,000 land use authorizations. Recreation Residence (RR) permits account for nearly 16,000 authorizations. For more than 10 years, many routine permit administration duties have been delayed or ignored because of more pressing program needs. In response to performance concerns from Forest Service managers and RR permittees, Associate Deputy Chief Larry Henson organized a national study team to review RR policies, procedures, and on-the-ground permit administration.

In May 1990, Henson established a 3-person steering committee that developed the review criteria and action plan for taking an intensive look at RR permit administration policies, procedures, and practices on the southern California national forests. Based on the preliminary finding, the review was expanded to sample national forests throughout the lower 48 states.

The review focused on RR permit administration, including processing transfers, reviewing and approving construction plans, fee appraisals, and billings; collecting land use fees; and monitoring permit compliance. Fee billings are usually issued by forest supervisor's offices, the remaining permit activities by the ranger districts. The Washington Office (WO) and regional offices provide direction, funding, and management review.

The WO-Lands staff selected a broad cross-section of sample units, after consulting with regional staffs. No special effort was made to focus on particular problems or themes other than determining the extent of possible full-time occupancy. The review examined permit administration on 21 national forests, 40 ranger districts, and 8 Forest Service regions.

Four-person teams, composed of Forest Service personnel with strong skills in permit administration, did the field work with help from the sample units. Always led by Roy Droege of the WO-Lands staff, the only permanent member, these rotating teams spent one to several weeks together conducting interviews and inspections in one or more regions. Between August 1990 until May 1991, they visited over 5,500 RR lots.

Using a form prepared by the steering committee, review teams first questioned the staff of the sample unit about their RR programs and problems, and then compared this information to actual lot conditions. All 5,500 plus lots were checked for recent construction and the necessary approval documents. Over 600 of these same lots were randomly chosen for lot inspections. Reviewers photographed nearly all lots they inspected, and the lots that showed signs of recent construction activity.

The final report was developed by Roy Droege with help from Ellen Heath and Mark Scheibel in WO-Lands, and Lee Urquhart of the Lands/Recreation staff on the Angeles National Forest. The data tables and other information related to the study are in the Appendix.

Recreation Residence Program

The Forest Service RR program gives private citizens the opportunity to own single-family cabins in designated areas of the national forests. The cabins are located within formally established "tracts" on "lots" designated for that purpose and are authorized and administered under the terms and conditions of a special use authorization (SUA) called a permit. The RR permit requires the payment of an annual rental fee based upon the fair market value of the use as determined by appraisal or other sound business management principles.

Currently, 15,570 RRs are under permit—equivalent to a city of 50,000 people—having a real property value of nearly one billion dollars and producing annual fees of 7.2 million dollars that are deposited in the United States Treasury. RRs occupy about 10,000 acres of high-value National Forest System (NFS) land and their receipts represent nearly 25 percent of the annual land-use income for the NFS (Forest Land Use Report, July 10, 1991).

RR permits can be found in all 9 Forest Service regions. Ninety-eight of 122 national forest administrative units and 291 of 653 ranger districts (or equivalent) contain RR permits. Most permits are in the western regions. The Pacific Southwest Region (California) leads the way with over 40 percent of the total, or nearly 6,600 RR permits. The Pacific Northwest Region (Washington and Oregon) follows with nearly 2,800 permits. At the other end of the spectrum is the Alaska Region with 49 RR permits. Over 85 percent of the ranger districts have less than 100 lots and two thirds have fewer than 40. Nearly 100 ranger districts (33 percent) have 10 or fewer RR lots. Of course, the location and number of RR permits directly affects local Forest Service interest in the program.

The RR permit and any permit amendments provide the holder with specific rights and privileges to occupy and use a specific area of land (lot) for recreation enjoyment. The use must be exercised at least 15 days each year, unless otherwise authorized in writing. A cabin is not to be used as a full-time residence to the exclusion of a home elsewhere. When a permit is reissued, it must contain clauses and provisions reflecting current conditions. The local authorizing officer decides the type of permit to issue. A RR may be sold and specific requirements may be imposed on the seller and/or buyer at the time the permit is transferred and reissued. Permits and permit amendments must be signed by the applicant and the authorized officer to be operative.

Recreation residences have existed since before the turn of the century, when national forests were forest reserves and were administered by the General Land Office in the U.S. Department of the Interior. The first RR lots were authorized by the Forest Management Act of June 4, 1897, also known as the "Organic Act".

The Forest Service, in its early years, issued thousands of RR permits on national forests near cities - such as the Angeles, the Oregon (Mt. Hood), and the Pike-San Isabel National Forests. In 1915, Congress passed the Term Permit Act which enabled the Forest Service to issue RR permits for terms longer than a year without annual renewal. The program continued to grow until RR permits numbered around 20,000 at mid-century.

Most of the RR permits involved high-value recreation land. In 1968, in recognition of other recreation needs, Chief Edward P. Cliff decided against establishing any more new RR tracts. In 1976, Chief John R. McGuire expanded the moratorium on new tracts to include no development of new lots within existing tracts. These policies are still in effect.

In August 1988, Chief F. Dale Robertson issued new policy to improve RR management. A new, 20-year permit form was adopted with updated administration guidelines. However, in response to a successful appeal, certain provisions of the 1988 policy were withheld from implementation for further review, reformulation, and then reissuance. Yet, over 12,000 new permits were issued before February 1989, when Assistant Secretary of Agriculture George Dunlop issued this appeal decision concerning the new RR policy. The reformulated policy is planned for release in 1993.

Chapter 2 - Findings and Recommendations

The following information comes from the 40 ranger districts, 21 national forests, and 8 Forest Service regions which participated in this national review of RR permit administration. The findings relate to what the reviewers learned from the interviews and field checks. The recommendations are based on suggestions made by participants in the study. These findings and recommendations form the basis for the Action Plan found in Chapter 3, and should be carefully considered in accomplishing that effort.

The sample units administer permits for nearly one-half of the 15,570 RR lots in the National Forest System. Over 100 Forest Service line and staff representatives provided data on RR permit administration data on their management of the 5,500 plus lots studied.

This report uses the terms "RR lot" and "RR site" interchangeably. Actually, a "RR lot" refers to the land under permit and a "RR site" includes the open land in the immediate vicinity used by the permittee. RR lots are called either "sample sites" or "drivebys" in the Appendix that accompanies this report. Sample sites are RR lots that had thorough lot inspections. Drivebys are RR lots that had cursory checks for recent construction, and thorough permit checks for proper construction approval procedures. Recent construction, as used here, means construction occurring in the last 7 years requiring Forest Service approval. Reviewers found that it takes about 7 years for "new" construction activity to weather to the point that it cannot be readily recognized.

PROGRAM

1. Direction

RR permit administration lacks management attention. Most units "react" to RR permit administration, not "plan" for it. Health and safety problems, permit transfers, and permittee requests top their list of RR tasks.

National and regional RR permit administration direction lack substance and consistency. Instructions on such important subjects as construction requirements, inspection frequencies, and transfer procedures are hard to locate in the Forest Service directives system. The Pacific Southwest Region is the only region with a comprehensive, current manual supplement on RR permit administration.

Forest land use and resource management plans (Forest Plans) recognize the importance of RR use but few contain specific RR standards or guidelines. Most ranger districts rely on unwritten policies and procedures derived from personal judgement and historical practices. Many district rangers let a staff-person manage the program and make the policy decisions. Several permittees complained to review teams about the "forever changing" policies of their ranger units.

- **Develop national and regional RR permit administration handbooks with emphasis on fair, consistent, and effective management.**
- **Revise local guides to reflect national/regional policy and direction.**
- **Involve permittees/other interested parties in policy development and implementation.**

2. Funding/Staffing

RR administration budgets are almost nonexistent; ranger district staffing is declining. Most ranger districts believe they do not have a big enough RR program and/or budget to justify a separate permit administration work plan. Only a few knew their actual permit administration costs. Nearly all ranger districts claimed to use the "charge as worked" principle, meaning to charge as budgeted, as much as practical. All claimed they needed more funds/staff to do the job.

Ranger district and Forest Supervisor's Office (SO) staffs spend one-half to one person-day respectively on each permit every year. At the ranger district, this normally means a staff officer, resource assistant, permit administrator and resource clerk. These people chiefly handle the permit transfers, lot inspections, permit enforcement, and permittee requests. Their SO counterparts, often a staff officer and their assistant, and a resource and/or budget assistant, normally do the billings, reviews, and budgeting.

- **Identify RR permit administration funding as separate budget item.**
- **Evaluate prospect of using special use receipts for RR administration.**
- **Establish/fund RR program to an acceptable performance level.**

3. Management Reviews

RR program reviews are few and ineffective. Management often overlooks RR permit administration in special uses reviews. Special uses staff customarily conduct reviews without involving other disciplines such as fiscal, engineering, and civil rights. Most units consider RR permits low priority compared to other types of special use. Few units believe their RR programs to be a major potential for waste, loss, and misuse of Federal resources. Most units have no formal program review process. Units that did conduct reviews could not locate or recall findings or actions. Ranger districts consider "functional assistance trips" (FATs) the best form of review. FATs solve problems. Such reviews went undocumented so their effectiveness could not be checked by review teams.

- Monitor permit administration management through regularly scheduled reviews.
- Involve other concerned staffs in all types of reviews.
- Document review results and follow-up actions.

4. Training

Practical training is the rule, formal training the exception. Units know the practical aspects of RR permit administration from on-the-job training. Few, if any, units fully understand their permit administration responsibilities as presented in national direction and policies. Almost all units asked for national or regional training on implementation of the new RR policy. They also want to improve their understanding of basic permit administration procedures and terminology. Some units requested specialized training in such areas as conflict resolution, and county codes and taxes.

- Establish required training module for all special uses administrators.
- Use local workshops/field trips to exchange ideas and techniques.

RELATIONSHIPS

1. Permittees

Most units claim good relationship with their RR permittees. Ranger districts with large RR permittee populations usually meet with them or their representatives at least annually. Typically, their smaller counterparts meet much less often, and informally. Units with regular RR permittee contact claim to have good permittee involvement in Forest Service activities. Units report that permittees typically join together to resolve a problem and then disband. Permittees at several locations complained to review teams about the lack of Forest Service presence in their tracts. This perceived lack of concern carried over into the permit files where, often, copies of procedural directives and billings were the only communication from units.

- Visit RR tracts and permittees regularly.
- Involve permittees in forest management activities.
- Work with permittees on local tract objectives, issues, and concerns.
- Encourage permittees to evaluate Forest Service SUA performance.

2. Newsletters

Newsletters are good but time-consuming. Most units use formal letters and personal visits to keep their permittees informed. The letters did not appear inviting or interesting to the review teams. Only 4 of 40 ranger districts published newsletters. These newsletters were attractive and informative, and answered such questions as how to sell or rebuild a cabin, add a room, or install a sign. The Summit Ranger District, Stanislaus National Forest, used its paper to thank permittees for their good work! Eight ranger districts rely on tract association newsletters and flyers to keep permittees advised. Units with heavy RR loads favored newsletters. Smaller workload units rejected them because of time or money constraints. Some units count on bulletins from the National Forest Recreation Association for RR information.

- Encourage use and expansion of Forest Service-permittee newsletters to provide general information and answer commonly asked questions.
- Streamline the newsletter approval process.

3. Tract Associations

Permittee associations can benefit permit administration. Permittee associations are chiefly found in the larger, more centralized RR tracts where shared-services are greatest. Associations serve as sounding boards for unit programs and help deal with local problems in and around the tracts. Several permittee groups have constructed trails, roads, and other facilities in cooperation with the units. Many associations hold SUAs for RR tract-related facilities such as roads, utility systems, and gates.

- Encourage permittees to form/belong to local tract associations.
- Involve tract associations in policy and permit matters.

4. Other Agencies

Other agency requirements can greatly increase the RR workload. Other agency requirements help form a unit's RR workload. These interests are greatest near urban areas where environmental requirements are more varied and strict. Varying standards among other agencies creates the appearance of inconsistent permit administration by the Forest Service. Counties normally administer any State requirements for RRs. RR improvements are an important tax source for some counties in rural areas. Mainly, one or two county departments handle all RR permit matters. The extent of the review depends on the agency requirements. Some give detailed reviews, others just check for a Forest Service approval. Some counties require permits for any kind of construction. Other counties only want permits for the larger projects such as building additions and sanitation systems. A few use the cost of the materials as a guide for requiring a permit. Ranger districts dealing with several counties must know the permit requirements of each agency.

- Know other agency requirements affecting RR permit administration.
- Work with other agencies on ways to improve (maybe hasten) the review and approval processes.

5. Congressional Representatives

Congressional involvement is sparse and problem oriented. Only a few units reported congressional involvement in RR administration activities. The interest centered on land use fees and permit terminations. Members of Congress have not tried to influence the normal administration of RR policies.

- Keep Congressional representatives advised of pending fee changes and permit terminations, and other Forest Service activities of immediate interest.

PERMITS

1. Records

Official permittee files are often incomplete. Important permit documents such as amendments, plans, approvals, maps, inspections, billings, and letters are not always kept together in the official permit folder. Official records are sometimes misplaced or discarded because those responsible for the files do not know their significance. On several national forests, the SO keeps the official file and the ranger districts use copies. In these situations, the ranger district copies always seemed more current. Key approval decisions are sometimes only recorded in the margin of a letter, on a telephone message slip, or in an inspection report.

- Keep the official RR permit files together at the ranger district level.
- Use photographs to record lot conditions and changes.
- Maintain record of tract, lot and cabin construction dates for work-planning.

2. Issuances/Improvement Documentation

Nearly all sample sites have new, term permits. Most permits were issued without transfer inspections, or correcting troublesome lot problems. Units missed an ideal opportunity to correct such problems as a condition of issuing a new permit. Now they are back to using the permit terms to gain compliance. Also, many ranger districts are confused on where and how to show improvements in the new permit. About half listed the improvements on the permit face. Many others relied on other records, i.e., inspection reports, maintenance and building plans. Several units listed items that had never been constructed and/or approved.

- Emphasize national direction on conditions for issuing new RR permits.
- Clarify instructions on listing improvements in new RR permits.

3. Clauses

Standard clauses seem adequate for most situations. Only a few units are using special clauses. These provisions deal with power withdrawal, pack stock, and grizzly bears.

- Rely on the standard permit clauses to cover most needs.

4. Operation and Maintenance (O&M) Plans

Less than 20 percent of the sample sites have O&M plans. Only a few units have complete plans. Most units question the need for a separate O&M document, saying that the same information can be obtained using the permit provisions. Many plans lacked essential information and/or permittee involvement. Some units noted needing more funds and/or time to implement the plan.

- Reexamine need for O&M plan and follow-up accordingly.

5. Sales and Transfers

Most RR improvements are purchased on the open market through real-estate agencies, newspaper ads, and permittees. Permittees do not need to notify the Forest Service when they want to sell their cabins. Many transactions stay within families. Units do not publicize their RR programs or keep RR listing and sales data. They do not monitor or attempt to influence the ethnic distribution of their RR permittees, so are unable to address questions of racial parity. Local real-estate agencies handle most transactions, often unknown to the Forest Service. The ranger district commonly learns of the sale after the fact, when contacted for a new permit.

There is a 5-10 percent annual transfer rate for RR permits. Transfers can take from a few hours to many months, depending on unit priorities and requirements. Some units review sales contracts, do environmental reviews, or interview new or potential owners, before approving a transfer. Others do nothing but get the signatures and sign the forms. Some delay transfers for budgeting reasons, and others until lot problems are corrected. Units that used the personal meeting approach appeared to have fewer compliance problems.

- Publicize the RR program.
- Monitor RR sales and transfers for civil rights compliance.
- Require preissuance meeting with permit applicants to review requirements and conditions, and document results.
- Make correction of lot deficiencies a condition of transfer.

6. Amendments

Amendments are not being used as required. Forest Service representatives are approving lot modifications verbally, by letter, or informal note on the permit without preparing a permit amendment. Often the permittee does not have a formal record of the changes. Frequently, the revision is overlooked when a new permit is issued. Permittee explanations of unit approvals frequently differ from the documentation, or lack thereof, in the official permit file. Some units are using the O&M plan list of improvements as the approval document.

- Issue instructions on how to amend authorizations, i.e., permits, construction plans, O&M plans.

7. Fee Collection

Fee collection is a problem some places. RR permits require advance payment of an annual rental fee. Review teams found units where late fees were frequent, and rental billings not paid for months or even years with payment problems were reluctant to take stronger action (termination) because of the time involved, and for fear of reversal. Also, some southern California units mentioned billing problems with "Lock Box", the centralized fee collection system. They were the only units to report such problems which, in hindsight, appear due to misunderstandings among staff groups.

- Establish a formal audit system to monitor permit fee administration.

8. Inspections

Inspection standards and frequencies vary according to unit preferences. Three types of inspection are in use: transfer, fire, and lot. As their names imply, all have different purposes. Transfer inspections are supposed to be done during permit "transfers." Fire inspections are used, as needed, in fire-prone areas. Lot inspections are actually permit compliance inspections, and they are to occur yearly. Also, most counties perform separate inspections for building permit compliance. Many conduct health and safety inspections at the request of the Forest Service.

Most units do not do transfer inspections. Instead they rely on the findings of previous fire and lot inspections. Fire inspections are usually done as expected or required. The same does not hold true for lot inspections. Region 8 is the only region that performs the required annual inspection. Most ranger districts in other regions only do lot inspections two or three times in a 10-year period. Figures 1a - b. Not surprising, lots inspected every one or two years looked the best.

Figure 1a

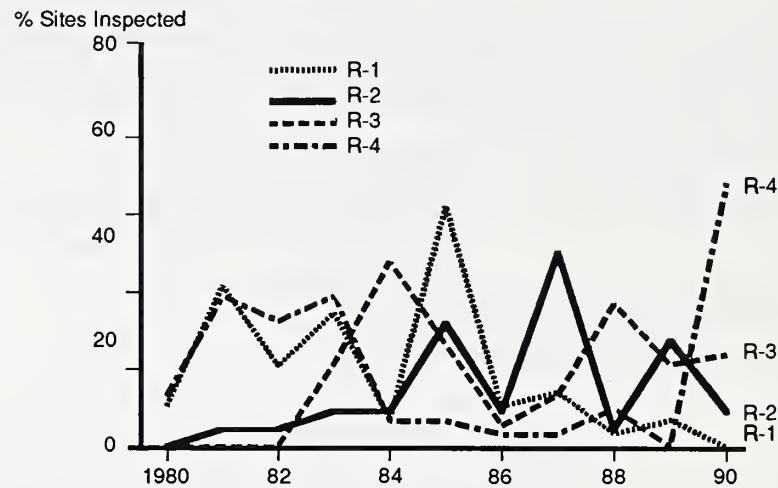
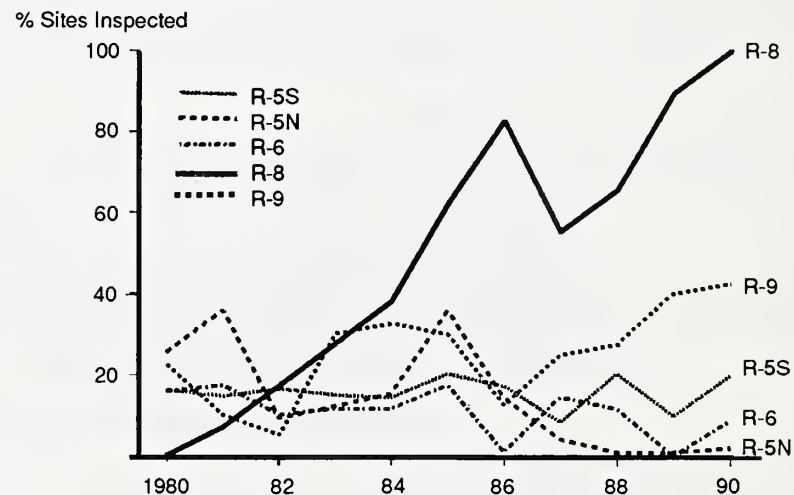
Inspection Frequency - Regions 1-4

Figure 1b

Inspection Frequency - Regions 5-9

A few units let permittees do the inspections (self-inspections). The results are mixed. Most oppose self-inspections because of the extra monitoring time required.

No two units seem to use the same lot inspection form. There is no national standard so most have developed forms to suit their individual purposes. Units in the same geographic area commonly use different forms and inspect for different items at, again, different intensities. These disparities in administration are prime sources for permittee complaints of unfair treatment.

- **Revise lot inspection frequency from yearly to biennial according to need.**
- **Standardize lot inspection standards and form.**
- **Include photographs of lot conditions as part on inspection process.**
- **Visit with and involve permittees in lot inspection process when possible.**
- **Use inspection letters to convey commendations as well as problems.**
- **Use other agency inspections to help decide and resolve permit compliance problems.**

9. Approvals

Internal approval procedures vary greatly. Units all have their own approval methods. Some require formal proposal and plans while others accept much less. Many RR projects are approved verbally, without any documentation. District rangers have full authority to approve most permittee requests. Their staffs handle the details and oversight. Few staff have formally delegated approval of their administrative authorities and responsibilities though they frequently "approve" items not known to the district ranger. Records show that many permittees take the unit at its word without distinguishing delegated authorities. If an inspector tells them in a report to "fix the roof" or "replace the shed", permittees normally do not call their district ranger to verify the inspector's credentials before responding.

- Delegate approval authority to the lowest possible level.
- Encourage uniform, consistent, and fair treatment in processing requests.
- Assure that delegated authorities and responsibilities are documented.
- Emphasize the importance of keeping good records of all approvals.
- Assemble, for optional use and quick approval, a basic pattern book of construction drawings for minor projects such as decks, sheds, and patios.

10. Enforcement

Permit enforcement is low and declining. Many units do not have the resources to assure permit compliance. Normally, they first try the "friendly persuasion" approach. If this tactic fails, they next try issuing violation notices and/or citations. Lastly, if still unsuccessful, some units will resort to permit termination. Most units just refuse to take this last step because of the time and effort involved, and the fear of not being supported by upper management. Many units said they would like to have a monetary fine system or some other strong enforcement procedure to use, short of permit termination, for open and notorious violations, and repeat offenders. Some units use other agency law enforcement officials on permit compliance problems.

- Use special incentives such as awards and letters to encourage good work by permit administrators.
- Evaluate possibility of monetary fine system.
- Provide advice and support to units with serious compliance problems.

11. Terminology

Many RR real-estate terms are not well understood. There are broad differences in interpretation and application of the Chief's RR policy, and the terms and conditions of permits. Many terms that appear self-explanatory ("single-family residence") present difficult administrative problems for the permit administrator. Terms dealing with ownership and occupancy are especially troublesome but building terms such as "loft" are also a problem. Other terms needing more explanation include time-sharing, principal residence, donations, full-time occupancy, single owner/permittee, multiple ownership, estates and family trusts, in-lieu lots, and termination/revocation.

- Identify and clarify confusing real-estate terms.

SITE CONDITIONS

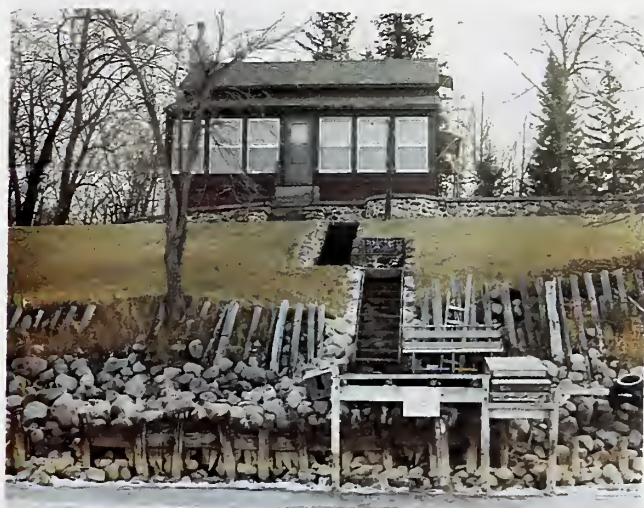
1. Cabin Settings and Styles

Cabin setting, style, and physical condition varies by location. Cabins can be found in all sorts of terrain from mountain crests to deserts, and along lakes and streams. Some cabins are on islands. Most are in rural areas but some adjoin big cities. The cabins themselves come in all shapes and sizes, and often are built of native materials. Their architecture is generally typical of the area.

Many cabins are old and need work. Some are in poor locations. Permittees have not wanted to make the corrections until they were assured by their permit tenures. Also, national forest management plans may directly effect what they can do. Many permittees appear ready to rebuild or replace their cabins now that they have or can obtain new, long-term permits. Their proposals must be considered and approved under today's building codes, land use and environmental requirements. Lots in sensitive environmental locations such as wetlands, floodplains, historic, or wildlife areas require more detailed review than formerly needed. Cultural resource examinations, and other studies also add to the workload. Some improvements may need relocation to meet present environmental standards. Units are just beginning to feel the effects of such requirements, and are finding them very time-consuming.

- Recognize and plan for increased permit administration activity, especially in construction requests, due to increased environmental awareness and the long-term tenure assurance provided in the new RR term permit.





2. Appearance

Many sample sites are of substandard appearance. Forest Service Manual (FSM) direction calls for maintaining facilities to standards of repair, orderliness, neatness, sanitation, and safety acceptable to the authorizing officer. With help from the permit administrators and other unit staff, the review teams judged the general physical condition of each site in terms of appearance and problems. This proved to be an excellent exercise. Many units had never had the opportunity to share concerns and ideas with their counterparts from other areas. The results were surprising. It always took less than an hour for the group to agree on the evaluation standards. Units that worked closely with their permittees had the best looking lots. Figures 2a - c.

- Standardize evaluation criteria for acceptable lot maintenance.
- Encourage field and cross-training of permit administrators.

Figure 2a

Visual Appearance - (622 Sample Sites)

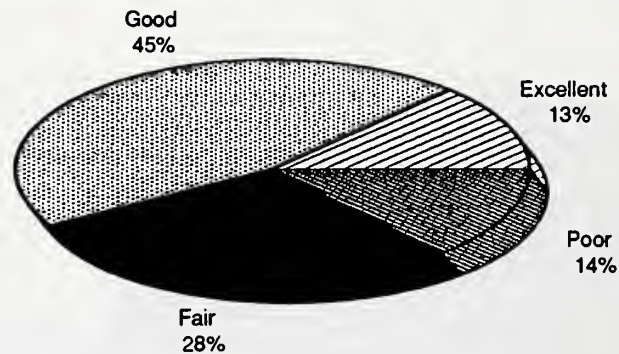


Figure 2b

Structure Problems

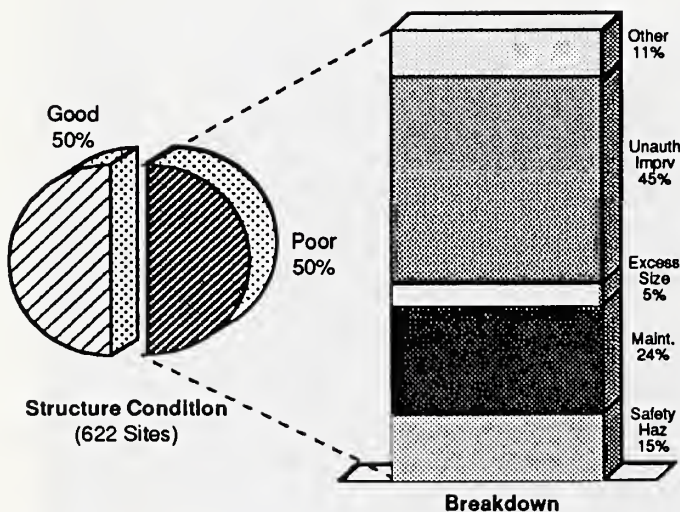
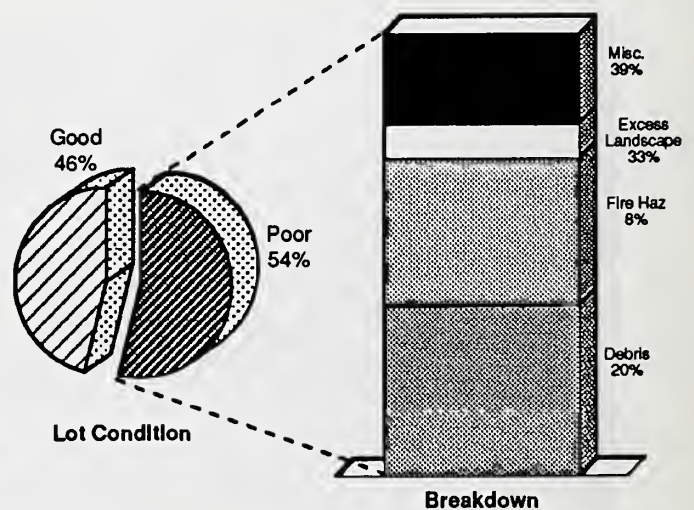


Figure 2c

Non-Structure Problems



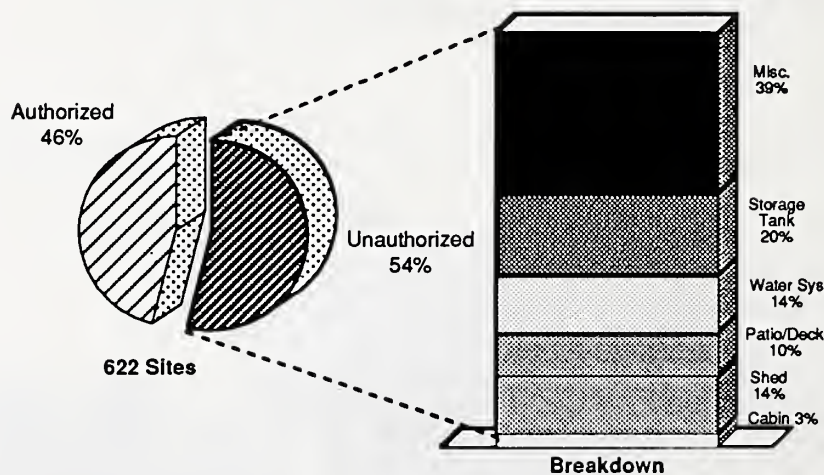


3. Improvements

Over half the sample sites have at least one unauthorized improvement. Improvements must be authorized in writing by the Forest Service. Most obvious lot facilities are approved, but obscure improvements such as storage tanks, driveways, water systems, footbridges, and out-buildings are commonly overlooked. Figure 3. Some permits authorize improvements that do not exist.

Figure 3

Unauthorized Improvements



The situation is the same for off-lot structures owned by permittees, particularly shoreline improvements. Boat docks and piers are commonly authorized but the related facilities are not. Paved pathways, extensive landscaping, decks, and boat lifts often lack written authorization. In some places, these facilities were arrayed such that the public could not comfortably cross or even reach the shoreline.

Also, many tract roads, bridges, and water systems are not under permit. Units allow RR permittees to use and maintain these facilities, often without oversight. Some of these improvements are in extremely poor condition. Many units said their permittees were unwilling to accept permits for these facilities due to concerns about personal liability.

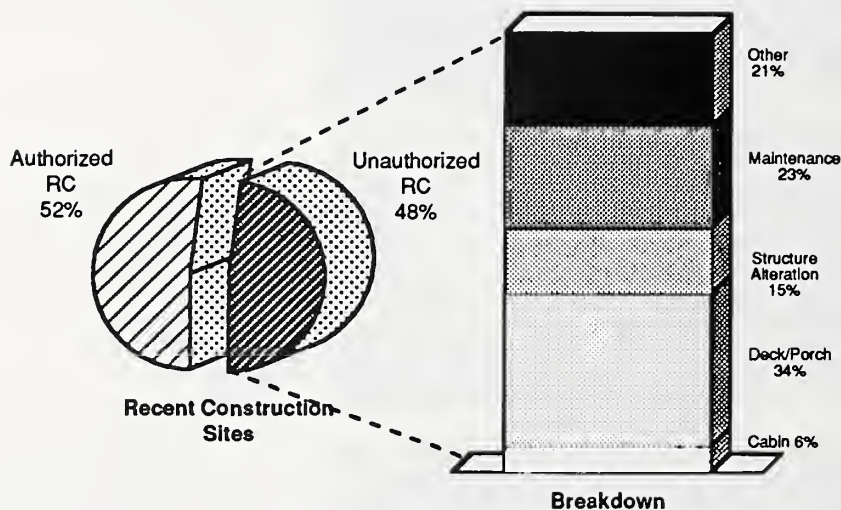
- Emphasize formal authorization of all lot and off-lot improvements.
- Resolve the permittee liability question for tract-used/owned facilities.
- Encourage permittee-prepared sketch maps to include in permit file showing size and location of all improvements, above and below ground.



4. Recent Construction

Nearly 50 percent of the sample sites had unauthorized, recent construction activity. In the total study, over 700 lots showed signs of recent construction. About half of all recent construction lacked proper, written approval. Figure 4.

Unauthorized, Recent Construction (RC)



- Require the approval officer's signature and the date on all approved construction plans.
- Explore using county construction requirements in lieu of Forest Service requirements where or when suitable.
- Emphasize follow-up inspections of new construction approvals.
- Encourage interim deadlines, progress reports, and maybe performance bonds for major cabin construction work.



5. Development Level

Cabin sizes are increasing dramatically in the absence of clear direction. In many places, the original cabin still exists. It is typically small, rustic, and unobtrusive. This placid condition can change dramatically depending on Forest Service requirements. Cabins that were 400-1200 square-feet in size may be replaced by ones of 3000 square-feet or larger. Selling costs increase accordingly, from several thousand dollars to sometimes a hundred thousand dollars or more.



Some units have "no-growth" policies; others, like the Pacific Southwest Region (Region 5), have definite building size limits. Units without established development limits rely on traditional values and perceptions in trying to keep the "small cabin in the woods" concept desired by most units and many RR permittees.

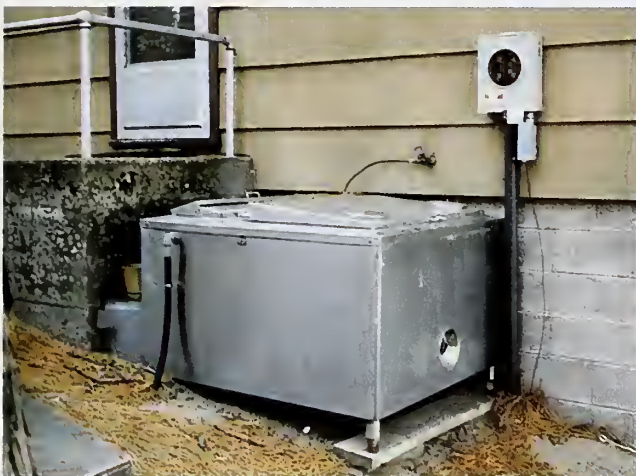
But, development limits have not prevented more subtle forms of growth that occur as permittees "improve" or "modernize" their cabin to fit today's needs. Slowly, porches are enclosed to become rooms, storage buildings are converted to "guest cabins," and patios are modified into decks or porches. These changes are most likely approved at the expense of any development limits. The results are obvious. "Size-creep" is a major administration problem in many RR areas. To hold-the-line on building expansion, units must be ready to deny projects that are otherwise okay. With the lack of resources, and a low sense of priority, most units are not seriously committed to this endeavor. The problem of size-limit enforcement is especially difficult and time consuming in handling unauthorized construction cases where requiring removal or compliance may be more damaging than leaving them in place.

- Establish national development limits for RRs.
- Involve permittees in the formulation of local development standards.
- Work with permittees on a transition plan for non-conforming structures.

6. Unique Structures

Unique structures lead to conflicting policies. Lots near urban areas might have cable television. Remote lots might have satellite dishes. Lots in the Lake States often have saunas and fish-bait tanks. Warm climate areas favor open porches and outdoor showers. Mountainous locations want stock-corral and hot-tubs and Southwest desert areas call for rock gardens and water-catchment devices. Most ranger districts are content to handle such structures without more direction. The primary problem is the lack of consistency among units about what they will approve.

- Involve permittees in development guidelines for unique structures.
- Assure consistency of administration of unique structure policies among units in the same geographic vicinity.



7. Maps and Signs

Most tracts and lots are hard to locate or identify. RR tracts and their lots are to be mapped and designated on-the-ground. Most tracts are mapped to some degree but not signed. Most are old and outdated. Abandoned or cancelled lots are regularly shown crossed-out, without formal approval or documentation. A few units, including Region 8 units, have signed the tracts. Most tract signs, and some lot signs, mention that the area is under SUA. Lot boundary corners are mostly gone or hidden. Boundary disputes and lot encroachments are common in high-density RR tracts. Lot numbers are posted at about a third of the sample sites. Many lots are hard to find, even when posted, due to the lack of signing standards.

- Require accurate survey maps for all tracts, with priority to units with encroachment problems.
- Reestablish lot boundaries in tracts where encroachments exist or are likely.
- Establish national standards for tract maps, boundaries, and signing.

8. Security

FSM environmental requirements can conflict with permittee security needs. Vandalism and theft are major permittee concerns that Forest Service policies do not directly address. Private lot security measures such as high fences, guard dogs, floodlights, noise alarms, and other such measures are in direct conflict with Forest Service guides to protect the forest environment. Some units bend the rules to help deter vandalism. Review teams found signs of vandalism at hundreds of cabins.

- Work with permittees to decide policy needs to reduce security concerns.
- Incorporate security measures in development guidelines.



9. Hazard-trees

Hazard-tree disposal practices are often wasteful. Hazardous trees in heavily forested RR tracts can be a major impact for permittees and the ranger districts. Units use a variety of disposal practices. Many sell the trees to the permittees at appraised timber sale or fuelwood rates. Others sell the timber to professional loggers. Many give-away the trees using a "free-use" permit, or verbal okay. Most hazard-trees are felled and left for wildlife and firewood purposes.

- Develop hazard removal plans for tracts with known hazard-tree problems.
- Emphasize public safety, environmental protection, and cost efficiency and effectiveness in hazard-tree removal actions.
- Involve area users, i.e., permittees, utility companies, in development and execution of hazard-tree removal plans.



10. Suspected Full-time Occupancy

Full-time occupancy is a major problem in some locations. A cabin is not to be used as a full-time residence to the exclusion of a home elsewhere. Several southern California national forests have major problems of full-time occupancy. A few other national forests near urban areas also have troubles. Full-time occupancy is difficult to stop/eliminate once started. There are no clear guidelines or rules to follow for dealing this problem. Units use signed statements, personal contacts, buyer interviews, and other methods to try and discourage full-time use. These deterrents have proved fairly successful.

The difficult job is to confirm and resolve suspected cases. This can be a long and exhausting procedure. Once confirmed, the problem must be eliminated. Unless the permittee agrees to return the use to RR status, the permit must be revoked. Units with major full-time occupancy problems do not have the resources to take strong corrective action. In the past, some national forests, such as the Angeles National Forest in southern California, have tried a "phase-out" approach with mixed results. Full-time use can cause extensive on and off-lot impacts.

- Develop national strategy to identify and resolve full-time occupancy issues.



11. Rentals

Cabin rentals are not being monitored. RR cabins can be leased to third parties for brief periods, if approved by the Forest Service. Cabin rental use appears widespread, but only a few units consider the activity worth monitoring. These units have developed their own cabin rental guidelines. The lease periods vary from a few weeks to several months, depending on the unit.

- Reconsider national direction on cabin rentals in terms of importance and consider other management strategies for handling, i.e., contract management.

12. Land Exchange

RR land exchanges are complicated and time-consuming. Regular land exchanges take about 2 years. Because of the variables involved, RR land exchanges can take over 10 years! The proposed Mt. Baldy RR exchange on the Angeles National Forest, for example, has been underway since 1970. These long time-frames can be extremely frustrating to the parties involved. With the limited resources they have, units tend to ignore or reduce the level of permit administration in tracts targeted for exchange. Permittees, believing their lots will soon be private, begin to make changes without approval. Before long, the units have many permit violations not normally found in non-exchange tracts including "inside" arrangements that conflict with Forest Service requirements. These problems are often difficult and time-consuming to resolve.

- Require full permit compliance until the exchange is completed.
- Establish exchange procedures and schedule in cooperation with involved permittees and agencies.
- Provide special assistance to units with major compliance problems.

Chapter 3 - Action Plan

1. Recognize Special Use Permit Administration Needs in Budget Advice, Preparation, and Allocation. (Due Date: December 31, 1993)

This is fundamental to professional management of these responsibilities. Regions are expected to be developing more reliable estimates of actual special use management costs, and using these costs in budget development. Additional team assignments have been proposed to address the remaining aspects of this element.

- a. Identify and track funding needs and accomplishments in the special uses program. A budget line item in the budget and targets is one possibility.
- b. Determine the cost to administer special uses. Begin by determining a baseline level for permit administration, i.e., what is needed to do the job required by existing laws, regulations, and policies.
- c. Review and identify alternate ways to fund and/or manage special use programs or activities, e.g., using special use receipts, contract administration, and service centers.

2. Achieve Consistency of Administration: Develop and Update National and Regional Special Uses Administration Handbooks. (Due Date: December 31, 1993)

This is a critical area. Outdated manuals, varying Regional and Forest policies, and lack of attention have created many inconsistencies and poor public service.

- a. Immediately identify and address the issues of national importance using the results from earlier reviews.
- b. WO and RO staff directors are responsible for updating national and regional handbooks to reflect results of item 2.a..

3. Establish and Implement a National Certification Policy/Program for Special Use Administrators that Includes Standards for Knowledge, Skills, Practical Experience, and Abilities (Tools) to Administer Permits. (Due Date: September 30, 1994)

Develop national guidelines for certification and implementation. The requirements will address the knowledge, skills, and experience needed to administer our special use responsibilities.

4. Recognize and Reward Good Special Use Administration. (Due Date: On-going)

This item can be implemented at the Regional level without more direction from the Chief's Office.

5. Give Special Funding, Staff Support, and Technical Assistance to Southern California Forests, as Needed, to Bring Permits into Compliance. (Due Date: September 30, 1997)

This item is unique to the southern California National Forests where urban pressures are having a major impact on special uses management. (As requested, the Region has identified the issues and prepared an action plan for Chief's Office review and approval.) The Directors of Lands and Recreation are responsible for helping with this effort and keeping the Regional Forester and the Chief informed of their efforts.

6. Consider Utilizing Zone Organizations to Administer Special Use Permits. (Due Date: On-going)

This may be an effective way to strengthen permit administration expertise and reduce costs. Possibilities for using zone and other organizational arrangements to administer special uses should be discussed by Regional Foresters and the Chief's Office during special use activity reviews and training sessions.

7. Establish or Implement Regional Inspection and Audit Systems to Monitor National Forest Special Use Permit Administration. (Due Date: December 31, 1993)

This item is designed to strengthen the internal accountability for management of land uses. Uses are near the top of the list for potential waste, fraud, or mis-use. Regional Foresters are expected to insure that appropriate inspection and audit systems are in place and functioning.

Appendix A

Data Tables

- | | |
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Policy/Guides, Forest Plans, Funding/Staffing,
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Table 1

Table 1
Survey Unit Sites:

Region	Total Sites	Forest	Total Sites	Ranger District	RC chk Sites	Sample Sites
R-1	910	Lewis & Clark	180	Rocky Mountain	114	10
		Idaho Panhandle	151	Priest Lake	133*	12
			331		247	22
R-2	1343	Arapaho-Roosevelt	162	Clear Creek	90*	5
				Boulder	32*	4
		Pike-San Isabel	225	Pikes Peak	61*	8
			387	South Platte	113*	12
					296	29
R-3	1151	Coronado	366	S. Catalina	226	24
		Tonto	330	Cave Crk	47	6
				Payson	262*	8
			696		545	38
R-4	1488	Fish Lake	126	Loa	115	12
		Wasatch-Cache	357	Logan	83	8
				Salt Lake	146*	11
			483		344	31
R-5	6576	Angeles	732	Arroyo Seco	101	9
				Mt. Baldy	427	105
				Saugus	129	14
				Tujunga	54	5
				Valyermo	21	2
		Cleveland	336	Descanso	250	22
				Trabuco	86	9
		Los Padres	158	Monterey	26	2
				Santa Barbara	115	14
				Santa Lucia	10	1
		San Bernardino	800	Arrowhead	37	4
				Big Bear	445	46
				Cajon	44	5
				San Gorgonio	271	28
			(2026)		(2016)	(266)
R-6	2778	Stanislaus	740	Summit	635	64
		Eldorado	1018	Amador	189	18
		Shasta-Trinity	163	Shasta Lake	152	16
			3947		2992	364
R-6	2778	Wenatchee	664	Naches	542	53
		Willamette	249	Detroit	159	6
			913		701	69
R-8	481	Cherokee	76	Ocoee	63	7
				Tellico	7	2
		Florida	170			
		Ocala		Seminole	104	12
				Lake George	34	4
R-8	481	Osceola		Osceola	32	4
			246		240	29
R-9	794	Chippewa	286	Cass Lake	150*	16
				Deer River	76	8
		Superior	196	Kawishiwi	99	10
			482	Gunflint	63	6
					388	40
Total	15521		7485		5753	622

*Unable to visit all of these sites due to access problems.

Table 4

INTERVIEW DATA: STATE, COUNTY, PERMITTEE, CONGRESSIONAL RELATIONSHIPS

Legend

- 1-State involved directly in RR admin.
- 2=County involved directly in RR admin.
- 3=Building plans required
- 4=Water/Sanitation plans required
- 5=County involved in RR permit transfer
- 6=FS meets formally with permittees
- 7=FS meets informally with permittees
- 8=Permittees have newsletter
- 9=FS has newsletter
- 10=FS/permittee cooperation frequent/close
- 11=FS/permittee cooperation occasional
- 12=FS/permittee cooperation is minimal/negligible
- 13=Permittee cooperation among themselves appears good
- 14=Permittee cooperation among themselves appears fair
- 15=Permittee cooperation among themselves appears poor
- 16=Congressional interest in RR issues (Y=yes)
- 17=Permittee involvement in unit's management/programs

[illegible]

Table 5

INTERVIEW DATA: INSPECTION TYPES/FREQUENCIES, SUSPECTED FULL-TIME USE,
CABIN RENTALS, USE SEASONS, TRANSFER RATE

Legend

1=Routine (annual) inspection

2=Fire inspection

3=Self inspection

4=Permit transfer inspection

(1 2 3 4 4+)=Estimated interval between inspections in years

5=Estimated no. of full-time occupants on unit

6=Unauthorized cabin rental suspected (Y=yes, #=?how many, ?=unknown, N=none)

7=Winter

8=Spring

9=Summer

10=Fall

11=Estimated yearly turnover of RR permits (NA=did not collect)

	DISTRICTS	INSPECT TYPE				FREQ YRS				SFT RNT				USE SEASON				TFR %
		1	2	3	4	(1 2 3 4 4+)	5	6	7	8	9	10	11	1	2	3	4	
	Priest L	X	X	X	X	-	-	-	X	0	?	-	-	X	-	X	-	10
	Rocky Mtn	X	X	-	-	-	-	X	-	1	N	-	-	X	-	X	-	10
	Boulder	X	-	-	-	-	-	-	X	1	?	-	-	X	-	X	-	10
	Clear Crk	X	-	-	-	-	-	X	1	N	-	-	-	X	-	X	-	6
	S. Platte	X	-	-	-	-	-	X	1	Y	X	X	X	X	X	X	X	10
	Pikes Pk	X	X	-	-	-	-	X	1	?	-	-	X	X	X	X	X	2
	Santa Catalina	X	X	-	-	-	-	X	1	Y	-	X	X	X	X	X	X	10
	Cave Crk	X	X	X	X	-	-	-	-	12	Y	X	X	X	X	X	X	10
	Payson	X	-	-	-	-	-	X	-	0	-	-	X	X	X	X	X	10
	Loa	X	-	-	-	-	-	X	-	0	Y	-	-	X	-	X	-	5
	Logan	X	-	-	-	-	-	X	-	?	?	-	X	X	X	X	X	5
	Salt L	X	-	-	-	-	-	X	-	?	?	-	-	X	-	X	-	1
	Arroyo S	X	-	X	-	-	-	X	-	?	?	X	X	X	X	X	X	NA
	Mt. Baldy	X	-	X	-	-	-	X	-	125	?	?	X	X	X	X	X	NA
	Saugus	X	-	X	X	-	-	-	-	?	?	X	X	X	X	X	X	NA
	Tujunga	X	-	X	X	-	-	-	-	?	?	X	X	X	X	X	X	NA
	Valyermo	X	-	X	X	-	-	-	-	?	?	X	X	X	X	X	X	NA
	Descanso	X	-	-	-	-	-	-	-	?	?	-	X	X	X	X	X	NA
	Trabuco	X	X	-	-	-	-	-	-	40	?	?	X	X	X	X	X	NA
	Monterey	X	-	-	-	-	-	-	-	?	?	X	X	X	X	X	X	NA
	Santa Bar	X	X	X	-	-	-	X	-	100	?	?	X	X	X	X	X	NA
	Santa Luc	X	X	-	-	-	-	-	-	0	?	-	-	X	-	X	-	NA
	Arrowhead	X	X	-	-	-	-	-	-	?	?	X	X	X	X	X	X	NA
	Big Bear	X	X	-	-	-	-	-	-	?	?	-	-	X	-	X	-	NA
	Cajon	X	-	-	-	-	-	-	-	18	?	?	X	X	X	X	X	NA
	San Gorgo	X	-	-	-	-	-	-	-	30	?	?	X	X	X	X	X	NA
	Amador	X	-	-	-	-	-	-	-	0	?	-	-	X	-	X	-	5
	Summit	X	X	X	-	-	-	-	-	0	Y	-	-	X	-	X	-	5
	Shasta L	X	X	X	-	-	-	-	-	2	?	?	X	X	X	X	X	20
	Naches	X	-	-	-	-	-	-	-	0	?	-	-	X	-	X	-	NA
	Detroit	X	-	X	X	-	-	-	-	0	?	?	X	X	X	X	X	10
	Ocoee	X	-	X	X	-	-	-	-	0	N	-	-	X	-	X	X	10
	Tellico	X	-	X	X	-	-	-	-	0	N	-	-	X	-	X	X	10
	Osoeola	X	-	-	-	-	-	-	-	0	N	-	-	X	-	X	X	10
	L. George	X	-	-	-	-	-	-	-	1	Y	X	X	X	X	X	X	10
	Seminole	X	-	-	-	-	-	-	-	12	Y	X	X	X	X	X	X	10
	Cass L	X	-	-	-	-	-	-	-	0	?	?	X	X	X	X	X	NA
	Deer R	X	-	-	X	-	X	-	X	0	?	-	-	X	-	X	-	NA
	Kawishiwi	X	-	-	-	-	-	-	-	2	1	-	-	X	X	X	-	5
	Gunflint	X	-	-	-	-	-	X	X	-	0	?	-	X	-	X	-	2

FORESTS

Id Pnhdle

Lew & Clk

Ara-Roos

Pike-San I

Coronado

Tonto

Fish L

Was-Cac

Angeles

Cleveland

Los Padres

S. Berdo

Eldorado

Stani

Shasta-T

Wenatc

Willam

Cherokee

Florida

Chippewa

Superior

Table 6

SAMPLE SITE DATA: SITES, PERMIT TYPE, O&M PLANS, USE, ASSOCIATIONS, SUSPECTED FULL-TIME OCCUPANCY, SITE APPEARANCE

Legend

- 1-Sample sites
 2-Sites with term permits
 3-Sites with annual permits
 4-Sites with expired or missing permit
 5-Sites with Operation & Maintenance (O&M) plan
 6-Sites with approved O&M plan completed correctly
 7-No. tract association permits
 8-Permit for water
 9-Permit for road
 10-Permit for other improvement
 11-No. suspected full-time occupancy sites
 12-Sites with structures and lot appearing in excellent condition
 13-Sites with structures and lot appearing in good condition
 14-Sites with structures and lot appearing in fair condition
 15-Sites with structures and lot appearing in poor condition

REGION	SMPL	PERM TYPE	ASSOCIA					SITE APPEARANCE				
			#	TYPE	SFT	TYPE	SFT	TYPE	SFT	TYPE	SFT	TYPE
R-1	22	22	0	0	0	0	0	0	0	0	0	0
	29	29	0	0	0	0	0	0	0	0	0	0
R-2	38	38	0	0	0	0	0	0	0	0	0	0
	31	30	1	0	0	0	0	0	0	0	0	0
R-3	266	202	52	12	78	4	62	51	4	8	58	18
	98	95	0	3	4	0	117	50	30	37	1	15
R-5	69	69	0	0	9	0	24	14	9	1	2	4
	29	28	1	0	20	7	2	2	0	6	9	11
R-6	40	37	3	0	1	1	7	7	0	0	6	23
	622	550	57	15	19	177	64	46	71	80	283	175
R-8	622	550	57	15	19	177	64	46	71	80	283	175
	622	550	57	15	19	177	64	46	71	80	283	175
R-9	622	550	57	15	19	177	64	46	71	80	283	175
	622	550	57	15	19	177	64	46	71	80	283	175

DISTRICT	SMPL	PERM TYPE	ASSOCIA					SITE APPEARANCE				
			#	TYPE	SFT	TYPE	SFT	TYPE	SFT	TYPE	SFT	TYPE
Priest L	12	10	0	0	0	0	0	0	0	0	0	0
Rocky Mtn	10	10	0	0	0	0	0	0	0	0	0	0
Boulder	4	4	0	0	0	0	0	0	0	0	0	0
Clear Crk	5	5	0	0	0	0	0	0	0	0	0	0
S. Platte	12	12	0	0	0	0	0	0	0	0	0	0
Pikes Pk	8	20	0	0	0	0	0	0	0	0	0	0
Santa Catalina	24	24	0	0	0	0	0	0	0	0	0	0
Cave Crk	6	6	0	0	0	0	0	0	0	0	0	0
Payson	8	8	0	0	0	0	0	0	0	0	0	0
Loa	12	12	0	0	0	0	0	0	0	0	0	0
Logan	8	7	1	0	0	0	0	0	0	0	0	0
Salt L	11	11	0	0	0	0	0	0	0	0	0	0
Arroyo S	9	4	4	1	0	0	0	0	0	0	0	0
Mt. Baldy	105	71	32	2	22	0	23	22	0	1	22	4
Saugus	14	4	10	0	0	0	0	0	0	0	0	0
Tufunga	5	2	3	0	0	0	0	0	0	0	0	0
Valyermo	2	2	0	0	0	0	0	0	0	0	0	0
Descanso	22	22	0	0	0	0	0	0	0	0	0	0
Trabuco	9	6	3	0	0	0	0	0	0	0	0	0
Monterey	2	2	0	0	0	0	0	0	0	0	0	0
Santa Bar	14	13	0	0	0	0	0	0	0	0	0	0
Santa Luc	1	1	0	0	0	0	0	0	0	0	0	0
Arrowhead	4	4	0	0	0	0	0	0	0	0	0	0
Big Bear	46	38	0	8	4	1	14	8	2	4	5	10
Cajon	5	5	0	0	0	0	0	0	0	0	0	0
San Gorgo	28	28	0	0	0	0	0	0	0	0	0	0
Anador	18	18	0	0	0	0	0	0	0	0	0	0
Summit	64	62	0	2	0	0	0	94	35	25	34	0
Shasta L	16	15	0	1	0	0	0	15	14	0	1	0
Naches	53	53	0	0	0	0	0	0	0	0	0	0
Detroit	16	16	0	0	0	0	0	0	0	0	0	0
Ocoee	7	7	0	0	0	0	0	0	0	0	0	0
Tellco	2	1	1	0	0	0	0	0	0	0	0	0
Oseola	4	4	0	0	0	0	0	0	0	0	0	0
L. George	4	4	0	0	0	0	0	0	0	0	0	0
Seminole	12	12	0	0	0	0	0	0	0	0	0	0
Cass L	16	14	2	0	0	0	0	0	0	0	0	0
Deer R	8	8	0	0	0	0	0	0	0	0	0	0
Kawishiwi	10	10	0	0	0	0	0	0	0	0	0	0
Gunflint	6	5	1	0	1	1	0	0	0	0	0	0
	622	550	57	15	19	177	64	46	71	80	283	175

REGION	SMPL	PERM TYPE	ASSOCIA					SITE APPEARANCE				
			#	TYPE	SFT	TYPE	SFT	TYPE	SFT	TYPE	SFT	TYPE
R-1	22	22	0	0	0	0	0	0	0	0	0	0
	29	29	0	0	0	0	0	0	0	0	0	0
R-2	38	38	0	0	0	0	0	0	0	0	0	0
	31	30	1	0	0	0	0	0	0	0	0	0
R-3	266	202	52	12	78	4	62	51	4	8	58	18
	98	95	0	3	4	0	117	50	30	37	1	15
R-5	69	69	0	0	9	0	24	14	9	1	2	4
	29	28	1	0	20	7	2	2	0	6	9	11
R-6	40	37	3	0	1	1	7	7	0	0	6	23
	622	550	57	15	19	177	64	46	71	80	283	175
R-8	622	550	57	15	19	177	64	46	71	80	283	175
	622	550	57	15	19	177	64	46	71	80	283	175
R-9	622	550	57	15	19	177	64	46	71	80	283	175
	622	550	57	15	19	177	64	46	71	80	283	175

Table 8

SITE DATA: ALL RECENT CONSTRUCTION (LAST 7 YEARS)

Legend

- 1=Sample sites with RC
 2=Drive-bys (RC sites)
 3=Total sites with RC (#1-#2)
 4=Total RC items (#5-#15)
 5=New/reconstructed cabins
 6=Building alteration, e.g., addition
 7=Deck/Porch
 8=Shed
 9=Privy
 10=Garage/Carport
 11=Guest cabin
 12=Pier/Dock
 13=Excess landscaping (Grounds)
 14=Maintenance
 15=Other

--TYPE OF NEW CONSTRUCTION--														
DISTRICTS														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Priest L	9	11	20	21	0	4	8	0	1	1	0	0	0	7
Rocky Mtn	5	15	20	19	1	5	2	3	2	0	0	0	1	4
Boulder	0	5	5	5	0	1	0	1	0	0	0	0	0	2
Clear Crk	1	13	14	19	0	7	6	0	0	0	0	0	0	5
S. Platte	3	19	22	29	1	3	14	1	0	0	0	0	0	1
Pikes Pk	2	9	11	13	1	1	8	1	0	0	0	0	0	2
Santa Catalina	9	26	35	41	2	3	27	1	1	0	0	0	0	7
Cave Crk	2	6	8	8	0	5	0	2	0	0	0	0	0	1
Payson	3	5	8	9	2	3	2	2	0	0	0	0	0	0
Loa	3	20	23	24	9	8	4	1	0	0	0	0	0	2
Logan	1	11	12	13	3	1	1	2	0	0	0	0	0	1
Salt L	7	8	15	18	1	2	8	2	0	0	0	0	0	5
Arroyo S	2	1	3	3	1	0	1	1	0	0	0	0	0	0
Mt. Baldy	31	19	50	56	12	11	12	3	1	3	1	0	1	8
Saugus	1	2	2	2	0	1	1	0	0	0	0	0	0	0
Tujunga	0	2	2	2	0	1	0	0	0	0	0	0	0	1
Valyermo	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Descanso	5	15	20	21	4	4	5	4	0	1	0	0	0	2
Trabuco	2	6	8	11	6	1	1	1	0	0	0	0	0	2
Monterey	0	1	1	1	1	0	0	0	0	0	0	0	0	0
Santa Bar	3	9	12	10	3	4	1	0	0	1	0	0	1	0
Santa Luc	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arrowhead	0	2	2	2	0	0	1	0	0	0	0	0	0	1
Big Bear	17	21	38	45	7	11	21	0	0	0	0	0	0	1
Cajon	1	1	2	2	0	1	0	0	0	0	0	0	0	0
San Gorgo	9	11	20	21	1	5	7	2	0	1	0	0	0	4
Amador	4	12	16	19	2	2	7	0	0	0	0	0	0	7
Summit	17	45	62	77	11	15	20	7	0	3	0	2	0	17
Shasta L	5	13	18	25	0	0	9	3	0	1	0	0	1	7
Naches	17	56	73	97	7	23	32	7	0	0	2	0	1	20
Detroit	8	52	60	86	6	10	36	2	1	0	0	0	0	25
Ocoee	2	24	26	30	3	5	8	1	0	0	0	2	0	5
Telllico	1	1	2	2	0	0	0	0	0	0	0	0	0	2
Oseola	0	10	10	12	2	2	3	3	0	0	0	0	0	1
L. George	1	8	9	11	1	1	0	3	0	3	0	0	0	1
Seminole	5	29	34	39	0	12	11	5	0	1	0	3	0	4
Cass L	7	25	32	37	2	8	8	4	1	2	0	1	0	6
Deer R	2	12	14	17	1	6	5	0	0	1	0	0	0	2
Kawishiwi	6	30	36	42	4	3	10	5	3	2	2	0	0	11
Gunflint	4	12	16	16	0	2	5	2	0	0	1	2	0	2
	195	761	94	284	69	10	20	6	10	9	53	179		
	566	905	171											
	195	566	761	905	94	171	284	69	10	20	6	10	9	53

--TYPE OF NEW CONSTRUCTION--

REGIONS														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Id Pndle	9	11	20	21	0	4	8	0	1	1	0	0	0	7
Lew & Clk	5	15	20	19	1	5	2	3	2	0	0	0	1	4
Ara-Roos	1	18	19	24	0	8	6	1	0	0	0	0	0	7
Pike-San I	5	28	33	42	2	4	22	2	0	0	0	0	0	11
Coronado	9	26	35	41	2	3	27	1	1	0	0	0	0	7
Tonto	5	11	16	17	2	8	2	4	0	0	0	0	0	1
Fish L	3	20	23	24	9	8	4	1	0	0	0	0	0	2
Was-Cac	8	19	27	31	4	3	9	4	0	0	0	0	1	10
Angeles	34	23	57	63	13	14	4	1	3	1	0	2	8	4
Cleveland	7	21	28	32	10	5	6	5	0	1	0	0	0	4
Los Padres	3	10	13	11	4	4	1	0	0	1	0	0	1	0
S. Berdo	27	35	62	70	8	17	29	2	0	1	0	0	1	10
Eldorado	4	12	16	19	2	2	7	0	0	0	0	0	0	7
Stanl	17	45	62	77	11	15	20	7	0	3	0	2	0	17
Shasta-T	5	13	18	25	0	0	9	3	0	1	0	0	1	7
Wenatch	17	56	73	97	7	23	32	7	0	0	2	0	1	20
William	8	52	60	86	6	10	36	2	1	0	0	0	0	25
Cherokee	3	25	28	32	3	5	8	1	0	0	0	2	0	7
Florida	6	47	53	62	3	15	14	11	0	4	0	3	1	5
Chippewa	9	37	46	54	3	14	13	4	1	3	0	1	0	8
Superior	10	42	52	58	4	5	15	7	3	2	3	2	0	13
	195	761	94	284	69	10	20	6	10	9	53	179		
	566	905	171											
	195	566	761	905	94	171	284	69	10	20	6	10	9	53

Table 11

	DISTRICTS	#	-----CALENDAR YEAR-----												TTL
			Sp1	90	89	88	87	86	85	84	83	82	81	80	
RPG	Priest L	12	0	1	1	1	9	0	2	1	0	0	0	0	14
	Rocky Mtn	10	2	5	0	2	2	2	5	1	2	1	1	0	21
	Boulder	4	0	1	1	1	0	0	0	0	0	4	0	0	6
	Clear Crk	5	0	0	0	0	0	0	0	0	0	0	0	0	0
	S. Platte	12	0	1	0	0	0	0	12	0	7	0	11	1	32
	Pikes Pk	8	0	0	0	4	3	6	2	3	2	1	2	2	23
	Santa Catalina	24	0	0	1	0	0	0	8	0	0	0	0	0	9
	Cave Crk	6	1	0	5	5	2	2	1	0	0	0	0	0	16
	Payson	8	8	8	8	0	0	8	8	8	0	0	0	0	48
	Loa	12	11	0	0	1	0	0	0	7	4	6	3	3	32
	Logan	8	4	0	3	0	1	2	2	2	3	3	1	1	21
	Salt L	11	0	0	0	0	0	0	0	0	3	3	0	9	9
	Arroyo S	9	0	0	0	0	0	0	0	0	1	2	2	0	5
	Mt. Baldy	105	1	3	9	4	7	6	4	2	5	1	1	1	43
	Saugus	14	1	0	2	0	1	2	0	0	0	1	3	10	10
	Tujunga	5	0	0	3	0	1	1	2	1	1	1	1	1	11
	Valyermo	2	0	0	2	0	1	0	1	0	0	1	1	1	6
	Descanso	22	22	15	17	14	12	10	9	9	7	5	5	5	125
	Trabuco	9	8	5	6	2	3	4	2	0	3	3	3	3	39
	Monterey	2	2	0	0	0	0	0	0	0	0	0	0	0	2
	Santa Bar	14	1	0	0	2	10	0	6	4	0	2	2	25	25
	Santa Luc	1	0	0	1	0	0	0	0	0	0	0	0	1	1
	Arrowhead	4	0	2	3	0	0	0	0	0	0	1	0	6	6
	Big Bear	46	0	0	1	0	19	20	19	18	15	16	16	126	126
	Cajon	5	0	1	0	0	0	0	0	1	2	3	4	14	14
	San Gorgo	28	0	0	11	1	0	0	1	0	1	6	7	28	28
RPG	Anador	18	0	1	0	0	0	0	1	0	0	2	7	11	11
	Summit	64	0	0	1	3	14	32	13	12	9	33	16	133	133
	Shasta L.	16	2	0	0	1	0	3	1	0	0	0	2	9	9
	Naches	53	0	0	0	0	0	0	0	1	0	1	2	1	5
	Detroit	16	6	0	8	10	1	10/2	7	8	6	10	10	78	78
	Ocoee	7	7	7	7	7	7	7	7	0	0	0	0	42	42
	Tellico	2	2	2	0	0	0	0	0	2	2	2	0	12	12
	Osceola	4	4	2	3	3	2	3	1	0	0	0	0	18	18
	L. George	4	4	4	4	4	4	4	0	0	0	0	0	20	20
	Seminole	12	12	11	5	2	11	8	6	3	0	0	0	66	66
	Casa L	16	14	0	2	0	0	6	8	11	0	0	4	45	45
	Deer R	8	0	4	0	2	1	3	2	1	0	3	5	21	21
	Kawishiwi	10	2	10	9	5	2	1	2	0	0	0	0	31	31
	Gunflint	6	1	2	0	3	2	2	1	0	2	1	0	14	14
		622	115	85	112	83	98	168	108	112	84	117	95	1177	1177
RPG	Id Pnhdle	12	0	1	1	9	0	2	1	0	0	0	0	14	14
	Lew & Clk	10	2	5	0	2	2	5	1	2	1	1	0	21	21
	Ara-Roos	9	0	1	0	0	0	0	0	4	0	0	0	6	6
	Pike-San I	20	0	1	0	4	3	18	2	10	2	12	3	55	55
	Coronado	24	0	0	1	0	0	0	8	0	0	0	0	9	9
	Tonto	14	9	8	13	5	2	10	9	8	0	0	0	64	64
	Fish L	12	11	0	0	1	0	0	0	7	4	6	3	32	32
	Was-Cac	19	4	0	3	0	1	2	2	5	6	6	1	30	30
	Angeles	135	2	3	16	4	10	9	7	4	8	6	6	75	75
	Cleveland	31	30	20	23	16	15	14	11	9	10	8	8	164	164
	Los Padres	17	3	0	0	1	2	10	0	6	4	0	2	28	28
	S. Berdo	83	0	3	15	1	19	21	20	21	22	25	27	174	174
	Eldorado	18	0	1	0	0	0	1	0	0	2	7	11	11	11
	Stanl	64	0	0	1	3	14	32	13	12	9	33	16	133	133
	Shasta-T	16	2	0	0	1	0	3	1	0	0	0	2	9	9
	Wenatc	53	0	0	0	0	0	0	1	0	1	2	1	5	5
	Willam	16	6	0	8	10	1	10/2	7	8	6	10	10	78	78
	Cherokee	9	9	9	7	7	7	7	2	2	2	2	0	54	54
	Florida	20	20	17	12	9	17	11	9	6	3	0	0	104	104
	Chippewa	24	14	4	2	2	1	9	10	12	0	3	9	66	66
	Superior	16	3	12	9	8	4	3	3	0	2	1	0	45	45
		622	115	85	112	83	98	168	108	112	84	117	95	1177	1177

Note: The highlighted numbers are self-inspections. District provides the inspection sheet; permittees perform the inspection and submit the completed form to District.

Appendix B

List of Exhibits

- B.1 Associate Deputy Chief Henson's request to initiate Recreation Residence "Pilot Study"
- B.2 Final "Pilot Study" guidelines
- B.3 Form used to do "permit-in-hand" inspections and checks on sites with recent construction
- B.4 Form used to interview Forest and District staff
- B.5 Review team members
- B.6 Forest and District staffs who participated in the review

Exhibit 1

United States
Department of
Agriculture

Forest
Service

WO

Reply to: 2720

Date: May 24, 1990

Subject: Recreation Residence Permit Administration

To: James C. Overbay
Deputy Chief, NFS


On a recent trip to Region 5, Gordon Small and I had the opportunity to review the administration of recreation residence permits on the Mt. Baldy District, Angeles National Forest. Our brief visit was sufficient to reveal major problems in permit administration, including unauthorized improvements and construction, apparent year-round occupancy, lack of District contact with permittees, and conflicts among the permittees and the District staff.

Our discussions indicate that this problem is not confined to this District and may exist on all the southern California forests. We believe the situation demands immediate attention. We recommend for your approval the enclosed pilot study and action plan to address this problem. We suggest the following personnel serve as a Steering Committee for the Pilot Study: Ken Myers, Assistant Director, Lands Staff, WO; Dick Benjamin, Director of Recreation, Region 5; and Jose Cruz, Deputy Forest Supervisor, Deschutes National Forest, Region 6. This Committee would develop an Action Plan for a Pilot Study Team, guide implementation of the Action Plan, and oversee implementation of the recommendations resulting from the Pilot Study field review.



Larry Henson
Associate Deputy Chief

Enclosure
Approved:



James C. Overbay
Deputy Chief

Overbay Memo: Enclosure

The following provides general guidance for the Pilot Study Team when doing the field work for the Pilot Study.

1. Study Procedure:

- a. Intensive analysis of recreation residences on the Angeles NF.
 - 1) Visit and record observations regarding permit administration on all recreation residences on the Mt. Baldy Ranger District, following up as appropriate with permittees based on these observations.
 - 2) Randomly select and visit 25 percent of the current permits on the Mt. Baldy Ranger District for an intensive on-site review, comparing it with the permit. (Approx. 107 permits)
 - 3) Visit and record observations in all (42) recreation residence tracts on the NF.
 - 4) Randomly select and visit 10 percent of the current permits on each of the other 4 Districts on the NF, comparing on-site conditions with the permit. (Approx. 33 permits)
- b. Evaluate procedure used on the Angeles NF and make adjustments to the study procedure.
- c. Continue analysis of permits on other NF's.
 - 1) Will include--
 - the other southern California NF's.
 - Other NF's in central and northern California
 - Other NF's in Regions 1, 3, 4, and 6.
 - 2) Selection of NF's included in this phase of the study and the sample intensity for each of these locations will be determined as a part of step b. above. Number of permits included would not be less than 10 percent of the total number of recreation residence permits on each of the NF included.
- d. Summarize information collected in field study and prepare report, including action plan for implementing recommendations.

2. Timetable:

- a. Initiate study on the Angeles about July 16, complete in 2 weeks.
- b. Continue study on the southern California NF's, about August 15, completing in 2 weeks.
- c. Continue study on other R-5 NF's and in other Regions about September 15, completing in 1 month.

Exhibit 2

Final "Pilot Study" guidelines

Issue: Recreation Residence permit administration is not meeting acceptable standards.

Context: An April 25, 1990 visit to the Mt. Baldy Ranger District, Angeles National Forest, by Larry Henson, Associate Deputy Chief, and Gordon Small, Director of Lands, revealed several permit administration problems. Homes were being rebuilt and substantially improved without Forest Service knowledge or approval. There was inconsistent application of policy. Site reviews were limited to transfers. Conflicts between permittees and between permittees and the Agency were escalating. Much staff time was involved in addressing confrontation and conflict activities such as FOIA requests (over 20 pending requests from David James on the Mt. Baldy District). Inconsistent action fostered discrimination complaints. The Regional Director of Recreation confirmed that these issues were not confined to the Mt. Baldy District. There is consensus that a variety of barriers have developed to effective permit administrative in several areas.

There is considerable speculation about the cause of the situation. One perspective was that resources have not been available to properly administer these permits due to higher priority demands. Another is that there has been a lack of Agency support for the actions needed to address the problems. The situation may not be unique to R-5, but R-5 has the greatest number of recreational residences and associated issues. A Pilot Study to evaluate the situation and implement needed actions would have substantial Agency-wide benefits for special use permit administration.

Proposal: The scope of the problem and necessary remedies cannot be addressed by a one day visit to a Ranger District. However, this situation cannot be ignored. The following actions and schedule is our recommended action to address this issues.

<u>Action</u>	<u>Date</u>
I. Establish a Steering Committee to address the issue.	5/15/90
II. Steering Committee establish Pilot Study guidelines	5/30/90
III. Detail minimum of 3 people (Pilot Study Team) to Southern California NF(s) NF for Pilot Study. Team will include 1 person from WO Lands staff, 1 from Regional Office Recreation staff, and 1 other from another Region.	6/15-7/15/90
A. Review all summer home permits to assess:	
--What is happening,	
--What should be happening,	
--Adequacy of Ranger District resources (funding and personnel) to handle the recreation residence administration workload.	
B. Develop an Action Plan to implement needed changes	8/30/90
IV. Implement Action Plan for FY91 on one NF.	FY91
Chief to provide supplemental funding if needed for FY91.	

Exhibit 2 (continued)

- d. Target date for completing field work November 1.
 - e. Preparation, review, and approval of Implementation Plan; select Pilot Forest.
 - f. Implement Pilot Study recommendations on 1 NF January 1, 1991.
 - g. Complete Pilot Study Field Test by December 31, 1991 and report to Chief.
3. Information to be collected in field analysis:
(To be collected in 2 categories)
- a. General, oversight information obtained through discussion with Forest and District staff.
 - 1) Existing policy and direction-
 - Regional and Forest Supplements
 - Forest Plan
 - Budget Direction
 - Priority setting; deciding on which permit administration situations to react to
 - 2) Budget-
 - Funds identified for permit administration.
 - Funds expended for permit administration.
 - Use of charged as worked.
 - Historical trends
 - 3) Staffing-
 - Present and historical
 - 4) Training-
 - That provided and that needed.
 - Determine if permit administrators are currently qualified.
 - 5) Monitoring-
 - Reviews held and documentation/recommendations (Activity, FAT's)
 - Is there a firm schedule?
 - Does followup occur?
 - 6) External Influences
 - Actions that result in deviation from normal administration of policy.
 - Congressional delegation involvement.
 - Permit Associations and representatives.
 - 7) State and local agency relationships.
 - Imposition of ordinances, zoning and code requirement.
 - Involvement in approval of new construction, rebuilding.
 - Local law enforcement within tracts.
 - 8) Characterization of the Recreation Residence Tracts
 - Does District meet with permittees; is it a formal, routine process?
 - Does an Association of owners exist, how formal? Does it have a newsletter?
 - Are permittees close-knit, cooperative with others?
 - Are there separate, group or association permitted uses?

Exhibit 2 (continued)

- 9) Permit Inspections
 - Administration of permit procedures.
 - Are self-inspections in use?
- 10) Permit Authorization Process
 - Application, reissuance, transfer procedures
- 11) Fee Collection Procedures
 - Preparation of billings, determination of past due accounts, assessment of penalties and collection.
 - Auditing of permittee accounts.
- 12) How is use of recreation residences reported in recreation use information?

b. Permit, case file and on-site visit.

- 1) Is the use authorized?
 - Are off-site improvements included?
 - Does a permittee association permit exist for common improvements?
- 2) Is permit current
 - Compare front page of permit to existing structure(s) on lot.
 - Are all clauses correct
 - What local clauses are used?
- 3) Inspections of the use authorized.
 - Frequency and degree or intensity.
- 4) Operations and Maintenance Plan
 - Is it current
 - Appearance of structure and lot; compliance with O & M plan.
- 5) Compliance with permit, Forest and Region policy
 - Presence of nonstructural improvements; lawns and landscaping.
 - Are signs, fences, satellite dishes present?
 - Are additional buildings present?
- 6) Full-time Occupancy
 - Is it known or suspected?
 - Is it authorized; what tenure and what type of permit used?
- 7) For additional buildings, new construction or rebuilding of authorized structure--
 - Is there local government approval/documentation?
 - Where and when was this received?
- 8) Evidence of communication effectiveness
 - Compliance with permit provisions and policy.
 - Overall appearance of tract and lot.
 - Is communication with permittees good or bad?

Exhibit 3

RECENT CONSTRUCTION AND SAMPLE SITE FORM
NATIONAL RECREATION RESIDENCE PILOT STUDY

Region:_____ Forest:_____ Dist:_____ Tract:_____ Lot:_____

Date:___/___/___

Sample:___ (Y/N) Driveby:___ (Y/N)

1. (a) Permit:___ T= Term (b1) Issuance date:___/___/___
A= Annual
U= Unauthorized (b2) Termination date:___/___/___

2. (a) All lot structures authorized:___ (Y/N)

(b) Not authorized:___ _ _ _ G=Guest cabin W=Water system
S=Storage shed T=Propane tank
P=Patio O=Other

3. All off lot improvements authorized:___ 4. Permit clauses correct:___

5. Local clauses used:___ (Y/N)

6. (a) Structural improvements comply with permit provisions and policy:___

(b) Non-compliance:___ _ _ _ S=Safety U=Unauthorized improvement
M=Maintenance O=Other
E=Excessive size

7. (a) Non-struct. improvements comply with permit provisions and policy:___

(b) Non-compliance:___ _ _ _ T=Trash S=Satellite dish
F=Fire O=Other
L=Landscaping/Lawns/Fences/etc.

8. (a) O&M Plan:___ (b) Current:___ (c) Signed by both parties:___

9. (a) Association permit for common improvements:___

(b) Authorized for:___ _ _ _ W=Water R=Road O=Other

10. (a) Full-time occupancy suspected:___ (b) Authorized:___

11. (a) New reconstruction within 7 years:___ (b) Authorized:___

(c) New cabin:___ Addition:___ Porch:___ Maintenance:___

(d) How authorized:___ P=Permit O=Other written authorization V=Verbal

12. Overall appearance of cabin & lot:___ E=Excellent G=Good F=Fair P=Poor

13. Fire inspections: Yr___,** Yr___,___ Yr___,___ Yr___,___ Yr___,___ Yr___,___

14. Site inspections: Yr___,** Yr___,___ Yr___,___ Yr___,___ Yr___,___ Yr___,___

**T=Transfer R=Routine S=Self

15. (a) Year of last paid fees:___ (b) Fee amount:_____

16. How are permittee/F.S. communications characterized:___

E=Excellent G=Good F=Fair P=Poor

17. Remarks_____

Roll:___; Frame:___-___

Exhibit 4

Interview Form

Recreation Residence Pilot Study

(General oversight information for use at Forest & District level)

Forest _____ District _____

POLICY AND PLANNING:

Are there Forest supplements to policy and guidelines?

Are there District supplements to policy and guidelines?

What is the Forest Plan direction for recreation residences?

What budget direction is there for Administration of Recreation Residences?

How are priorities set to decide what permit administration actions will be taken?

Are project work plans used?

BUDGET:

How are funds identified for permit administration?

Are funds expended on permit administration consistent with planned expenditures?

Is "charged as worked" used?

What is the unit's present budget for administration of recreation residences?

What is the unit's present budget for special uses?

What is the unit's historical budget trend?

STAFFING:

What is the unit's present staffing for recreation residence administration?

What is the unit's historical staffing?

WORKLOAD:

How many special-use permits does the unit administer?

How many recreation residence permits does the unit administer?

TRAINING:

What training is provided to the unit? By whom?

What training is needed?

Have all permit administrators participated in the offered training?

PROGRAM OVERSIGHT:

What program review processes are used? (FATS, Activity, Program Reviews)

When was the most recent? What was it? Who did it?

What documentation exists as a result of the last review?

What followup process exists?

EXTERNAL INFLUENCES (actions that result in deviation from normal policy administration)

Are there specific situations of Congressional involvement? What are they?

Do permittee associations and representatives influence Administration decisions? What are some examples?

(Continue next page)

Forest _____ District _____

POLICY AND PLANNING:**STATE AND LOCAL AGENCY RELATIONSHIPS:**

What ordinances, zoning, and code requirements exist?

What agencies are involved in approval of construction and reconstruction?

How are they involved?

Why are they involved; at Forest Service request or through their own ordinances?

RELATIONSHIPS WITH TRACT ASSOCIATIONS:

Does the District Ranger routinely meet with permittees?

Formally or informally?

How frequent are these meetings?

Are permittee/Forest Service newsletters used as communication tools?

Are permittees close-knit?

How is their cooperation with each other characterized?

Are there separate, group, or association permitted uses?

PERMIT ADMINISTRATION PROCESSES:

What inspection processes are used?

Are self-inspections used? Why, or why not?

What are the Forest's inspection frequency requirements?

What is the standard authorization process?

Are there needs to deviate from the standard processes?
If "yes" why?

COMMENTS:

Exhibit 5

REVIEW TEAM MEMBERS

Survey Area	Name	Work Location	DG Address
R-1	Allen, Bruce Barwick, Bob Droege, Roy* Hagen, Arlyss O'Brien, Dave	RO-1 Deerlodge NF, R-1 WO-Lands Lewis and Clark NF, R-1 RO, R-1	R01A R01F09A W01A R01F15A R01A
R-2	Devore, Pam Droege, Roy* Heath, Ellen Myers, Ken Wright, Greg	RO-2 WO-Lands WO-Lands WO-Lands Black Hills NF, R-2	R02A W01A W01A W01A R02F03D03A
R-3	Droege, Roy* King, Carol Maynard, Art Shumate, Jon	WO-Lands Lewis and Clark NF, R-1 RO, R-3 (now retired) Prescott NF, R-3	W01A R01F15D01A R03F09D03A
R-4	Droege, Roy* Elder, Frank Hohl, David VanBruggen, Bill	WO-Lands RO, R-4 (Now retired) Bridger-Teton NF, R-4 Toiyabe NF, R-4	W01A R04F03D07A R04F17D02A
R-5	S.Cal. Bush, June Droege, Roy* Dymkoski, Mark Marvin, Ron Scheibel, Mark Urquhart, Lee Williams, Ruben N.Cal. Droege, Roy* Dymkoski, Mark Fleenor, Nancy Maks, Donnie	LTBMU, R-5 WO-Lands RO, R-5 Wenatchee NF, R-6 WO-Lands Angeles NF, R-5 WO-Lands (retired) WO-Lands RO, R-5 Sierra NF, R-5 Mt. Baker-Snoqualmie NF, R-6	R05F19A W01A R05A R06F17D07A W01A R05F01A W01A R05A R05F15D53A R06F05D07A
R-6	Droege, Roy* Freedman, Lisa Galaba, Jim Shaw, Ginger	WO-Lands RO, R-6 Winema NF, R-6 (now RO, R-6) Angeles NF, R-5	W01A R06C R06C R05F01D52A
R-8	Buntrock, Suzanne Droege, Roy* Hemingway, George Henson, Larry Pence, Sandy	Florida NFs, RO, R-8 (now RO, R-4) WO-Lands RO, R-8 NFS-WO (Now RF, R-3) RO, R-8	R04A W01A R08B W03A R08B
R-9	Droege, Roy* Frits, Garry Hanson, Duane Hink, Bill Peterson, Tom Stocker, Bill	WO-Lands Chippewa NF, R-9 Superior NF, R-9 Chippewa NF, R-9 Superior NF, R-9 Chippewa NF, R-9	W01A R09F03D03A R09F09A R09F03A R09F09D02A R09F03D02A

* Team Leader

Exhibit 6

**REVIEW
PARTICIPANTS**

Survey Unit	Participants
Region 1	
Idaho Panhandle NF	William Morden, John Criswell, Ron Young
Priest Lake RD	Albert Collotzi, Debbie Butler
Lewis and Clark NF	Dale Gorman, Jerry Reese, William Duryee, Paul Threlkeld
	Arlyss Hagen
Rocky Mountain RD	Seth Diamond, Carol King
Region 2	
Pike-San Isabel NF	Marvin VanderKolk, William Zimmerman, Darlene Mattson
Pikes Peak RD	Jim Montoya, David Griffin, Grady McMahon
S. Platte RD	Edward Ryberg, Glen McDimit, Debra Gardunio
Arapaho-Roosevelt NF	Austin Condon, Kim Berns
Clear Creek RD	Larry Lidner, Debra Ryon, Marianne Kartinatis
Boulder RD	Michelle Nolde
Region 3	
Coronado NF	Michael Borens, Jerry Connor, Marquita McCrome
Santa Catalina RD	Steve Plevel, Terry Austin, Stephen Hensel
Tonto NF	Jim Kimball, Carl Taylor, Rod Byers, Pete Darnell
Cave Creek RD	Delvin Lopez, Vicki Collins
Payson RD	Steve Gunzel, Rod Byers
Region 4	
Fishlake NF	Kent Taylor, Max Reid
Loa RD	Gary Laing, Kent Traveller, Barbara Torgerson
Wasatch-Cache NF	Frank McElwain, Betty Reed
Cache RD	David Baumgartner, Chip Sibernsen
Salt Lake RD	Mike Sieg, Jim White, Steve Vanderberg
Region 5	
Angeles NF	Paul Johnson, Larry Marlow, Ed Medina, Lee Urquhart
Arroyo Seco RD	Terry Ellis, Don Wapshaw
Mt. Baldy RD	Don Stukkers, Tom Spencer, Ginger Shaw, Marty Johnston
Saugus RD	Mike Wickman, Vince Miles
Tujunga RD	Susan Swinson, Diane McComb, Steve Bear
Valyermo RD	Al Kellog
Cleveland NF	Sue Murphy
Descanso RD	Rich Tobin, Janice Thompson
Trabuco RD	Maribeth Gustafson, Fran Colwell
Eldorado NF	Jerry Hutchins, Tom Whear, Bob Hensley
Amador RD	Judy Yandoh
Los Padres NF	Erwin Ward
Santa Barbara RD	Patrick Pontes, Joan Brandoff-Kerr
Santa Lucia RD	Manual Madrigal
Monterey RD	Kathleen Jordan, Nancy Woolsey, Dick Zechentmayer
San Bernardino NF	Gail Van der Bie, Loretta Graham
Arrowhead RD	Jim Miller
Big Bear RD	Rebecca Aus, George Kenline
Cajon RD	Elliot Graham, Gary Earney, Renee Buvik
San Gorgonio	Judyth Reed, Steven Stump

Stanislaus NF	Jan Wold, Art Smith
Summit RD	Herb Hahn, Ed Rosenbaum
Shasta-Trinity NF	Bob Tyrrel, William Carpenter
Shasta Lake RD	Wayne Eddy, Bob Forbes, Bob Stevens

Region 6

Wenatchee NF	Marion Dehnert, Monty Heath
Naches RD	Don Rotell, Jim Tyler, Norman Anderson
Willamette NF	
Detroit RD	Ken Lindsay, Verna Ketchum

Region 8

Cherokee NF	Lewis Kearney, Ruby Cato
Ocoee RD	Gary Williams, Al Turner
Tellico RD	Larry Fleming, Junior Bunch
Florida NFs	Suzanne Buntrock
Osceola RD	Keith Lawrence, Dave Hamilton, Jim Ellis
Lake George RD	Jerry Clutts, Eddie Rollins, Harold Rivers
Seminole RD	Jim Thorsen, Diane Bolt, Mitch Cohen

Region 9

Chippewa NF	William Hink, Paul McIntyre
Cass Lake RD	William Stocker, Jack Gustafson
Deer River RD	Garry Frits
Superior NF	Duane Hanson, Dave Schmidt
Gunflint RD	Tom Peterson
Kawishiwi RD	Roger Baker

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